

Wontech % Raymond Blanche Consultant NST Consultants, Inc. 641 Shunpike Road, Suite 311 Chatham, New Jersey 07928

July 29, 2019

Re: K191154

Trade/Device Name: Hair Boom 69 Regulation Number: 21 CFR 890.5500 Regulation Name: Infrared Lamp

Regulatory Class: Class II

Product Code: OAP Dated: March 11, 2019 Received: May 1, 2019

## Dear Raymond Blanche:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. Although this letter refers to your product as a device, please be aware that some cleared products may instead be combination products. The 510(k) Premarket Notification Database located at <a href="https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm">https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm</a> identifies combination product submissions. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's

requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803) for devices or postmarketing safety reporting (21 CFR 4, Subpart B) for combination products (see <a href="https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products">https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products</a>); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820) for devices or current good manufacturing practices (21 CFR 4, Subpart A) for combination products; and, if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to <a href="https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems">https://www.fda.gov/medical-device-problems</a>.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (<a href="https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance">https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance</a>) and CDRH Learn (<a href="https://www.fda.gov/training-and-continuing-education/cdrh-learn">https://www.fda.gov/training-and-continuing-education/cdrh-learn</a>). Additionally, you may contact the Division of Industry and Consumer Education (DICE) to ask a question about a specific regulatory topic. See the DICE website (<a href="https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice">https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice">https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice</a>) for more information or contact DICE by email (DICE@fda.hhs.gov) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

Neil R. P. Ogden, M.S.
Acting Team Assistant Director
Light Based Devices Team
DHT4A: Division of General Surgery Devices
OHT4: Office of Surgical
and Infection Control Devices
Office of Product Evaluation and Quality
Center for Devices and Radiological Health

Enclosure

#### DEPARTMENT OF HEALTH AND HUMAN SERVICES Food and Drug Administration

Form Approved: OMB No. 0910-0120

Expiration Date: 06/30/2020

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Indications for Use	See PRA Statement below.
510(k) Number (if known)	*
K191154	
Device Name Hair Boom 69	
Indications for Use (Describe) The Hair Boom 69 is indicated to promote hair growth in females with androge Classifications I - II, in males with androgenetic alopecia who have Norwood-Both, Fitzpatrick Classifications of Skin Phototypes I - IV.	
Type of Use (Select one or both, as applicable)	
Prescription Use (Part 21 CFR 801 Subpart D)	Counter Use (21 CFR 801 Subpart C)

#### CONTINUE ON A SEPARATE PAGE IF NEEDED.

This section applies only to requirements of the Paperwork Reduction Act of 1995.

#### \*DO NOT SEND YOUR COMPLETED FORM TO THE PRA STAFF EMAIL ADDRESS BELOW.\*

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"An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB number."

# 510(k) Summary WONTECH

### **Submitter's Contact Information**

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Chatham, NJ 07928

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(973)539-7444

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(973)539-7445

# Name of Device and Name/Address of Sponsor

Trade Name:

Hair Boom 69

**Sponsor Contact** 

Ms. Gyuri (Erin) Park

Information:

WONTECH.

64 Techno 8-ro, Yuseong-Gu

Daejeon

Republic of Korea 305-500

Common or Usual Name:

Lamp, non-heating, for promotion of hair growth

**Classification Name:** 

Infrared lamp per 21 CFR 890.5500

**Classification Code:** 

OAP (Laser, comb, hair)

# **Predicate Devices:**

**Device Trade Name** 

Manufacturer

Hair Boom 69 (K182562)

Wontech

### **Reference Devices:**

Hairmax Lasercap 80 (K180885) (For the OTC Indication for Use)

Lexington International

Date Prepared:

March 11, 2019

### Intended Use / Indications for Use

The **Hair Boom 69** is indicated to promote hair growth in females with androgenetic alopecia who have Ludwig-Savin Classifications of I-II, males who have Norwood-Hamilton Classifications of IIa-V and for both, Fitzpatrick Classification of Skin Phototypes I to IV.

# **Technological Characteristics**

The **Hair Boom 69** diode laser is configured within an outer helmet and protective inner liner. The use of diode lasers provides for a full coverage of the upper 1/3 of the head; i.e., the area commonly covered with stylized hair. At the end of the therapy cycle, the system signals that therapy is complete and ready to be powered down, by emitting an audible beep pattern.

#### Performance Data:

No clinical performance data was produced for this submission because the Hair Boom 69 is an identical device in optical, electronic and mechanical function as well as recommended clinical treatment regime, to the predicate device, the Hair Boom 69.

The Hair Boom 69 was tested to internationally recognized standards, consistent with the current recommendations adopted by the FDA.

- 1. IEC 60825-1 Edition 2.0 2007 03 Laser Safety & Classification
- 2. IEC 60601-1:2005 (currently called AAMI/ANSI standard) Basic Safety and Essential Performance
- 3. IEC 60601-1-2 Edition 1.0. 2010 -04 EMC. This replaces Edition 3.0 2007 03
- 4. IEC 60601-1-11 Edition 1.0 2014 06 Home Use. This replaces Edition 2010 04
- 5. IEC 62304 Edition 1.1 2015 06 Software and Life Cycle Processes
- 6. ISO 14971 Second edition 2007 03 01 Application of Risk Management to Medical Devices
- 7. ISO 10993-1 2009 (R) 2013 Biological Evaluation of Medical Devices Part 1 Evaluation and Testing within a Risk Management Process.

  ISO 10993-10:2010/(R) 2014 Biological Evaluation of Medical Devices Part 10: Tests for Irritation and Skin Sensitization.

**Over-the-Counter Testing** was performed for this proposed submission. 30 female and male subjects were tested for Self-Selection, Usability and Hazards & Precautions. The results of these tests are contained in Section 10, Substantial Equivalence. The results demonstrate that 86.66% of subjects satisfactorily passed the testing.

## Substantial Equivalence

The Hair Boom 69 is equivalent to the device known as the Hair Boom 69 cleared under 510(k) number, K182562. It is as safe and effective as the predicate device.

Both systems, which use red light diode lasers which are classified as class IIIa/3R laser systems by the IEC standard for allowable emission levels, which is a recognized standard by the FDA as well, and the adverse event profile is the same.

Finally, data summarized in the 510(k) notice confirms the safety and efficacy of the Hair Boom 69 for Over-the-Counter Use, according to Part 21 CFR 801 Subpart C. For these reasons, the Hair Boom 69 satisfies the FDA's standard for substantial equivalence with respect to intended use, technological and design characteristics.

## **Treatment Protocol**

The Hair Boom 69 with an intended use of Prescription is the same device as the Hair Boom 69 proposed for OTC use. These devices are one and the same.

The following Comparison Chart in support of substantial equivalence is provided:

Hair Boom 69 (K182562) Hair Boom 69 (Proposed)		
LLLT Device Type	LLLT Device Type	
Prescription	OTC	
Intended Use - Androgenetic Alopecia	Intended Use - Androgenetic Alopecia	
Contain Laser Diodes- 69 Class 3R	Contain Laser Diodes- 69 Class 3R	
Helmet Design	Helmet Design	
Wavelength 650 +/- 5 nms.	Wavelength 650 +/- 5 nms.	
Marketing Clearance – Females & Males, Prescription	Marketing Clearance -Females & Males OTC	
Passive Use-Hands Free	Passive Use-Hands Free	
OAP Classification	OAP Classification	
Classification Name -Infrared Lamp	Classification Name -Infrared Lamp	
Common Usage Name - Lamp, Non-Heating	Common Usage Name - Lamp, Non-Heating	
General & Plastic Surgery Committee	General & Plastic Surgery Committee	
Skin Phototypes - I- IV	Skin Phototypes - I- IV	
Hamilton-Norwood IIa-V Hair Loss Classification	Hamilton-Norwood IIa-V Hair Loss Classification	
Ludwig-Savin I – II Hair Loss Classification	Ludwig-Savin I – II Hair Loss Classification	
Device Class II	Device Class II	

## Conclusion

With the data presented in the Comparison Chart, the sponsor believes that this demonstrates the Hair Boom 69, is substantially equivalent to the Hair Boom 69 and based upon the equivalent technological designs of the compared devices, the Over–the-Counter Testing performed and

submitted in this application, the sponsor requests the FDA to clear the device via the 510(k) notice.